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November 9, 2021

VIA CM/ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875-RBK-JS (D.N.J.)

Dear Judge Vanaskie:

Plaintiffs respectfully submit this letter in advance of the November 10, 2021 status conference.

1. Baohua Chen's Deposition

ZHP has failed to do anything to coordinate the scheduling of Baohua Chen's deposition. Plaintiffs have reached out to ZHP's counsel and requested dates so that the deposition can be scheduled at a mutually convenient time, with no success. ZHP notified the Court and counsel during the last conference that the Chinese government had refused to issue a travel permit to Mr. Chen, and Plaintiffs request that ZHP provide a full and transparent update, with dates and details of what is happening on that front, and if it is clear that the travel permit will not be issued, Plaintiffs request that this be confirmed.

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2. Update on New Economic Loss and Medical Monitoring Class Representatives

Plaintiffs continue to work with Defendants to ensure the timely depositions of all “new” named plaintiffs in the class cases. All such plaintiffs submitted PFSs weeks ago, several have been deposed already, and many more are scheduled for deposition (including eight this week alone). Plaintiffs believe all of the depositions can and should be completed by the Court’s deadline next month.

Thank you for your courtesies and consideration.

Respectfully,



ADAM M. SLATER

cc: All Counsel (via CM/ECF)